

Field Office Transportation Evaluation Program
Field Office Transportation and Packaging Operations Requirements
Revision 0, November 2000

Standard: DOE/NNSA Field Office transportation and packaging management provides implementation of applicable DOE order requirements, Departmental policies, and procedures pertaining to DOE transportation and packaging oversight.

Reference: DOE Order 411.1A, DOE Order 460.1A, DOE Order 460.2, and DOE Policy Memorandum.

Self-Assessment/Evaluation Actions	RESPONSE			Comments
	Y	N	N/A	
I. FRAM REQUIREMENTS				
1. Has the Field Element implemented the requirements of the FRAM applicable to its operations?				
2. Has the FRAM included the responsibilities and requirements of DOE Orders 460.1A and 460.2?				
3. Are you the designated individual responsible for implementation of the FRAM requirements as they pertain to DOE Orders 460.1A and 460.2?				
II. DOE ORDER 460.1A PACKAGING AND TRANSPORTATION SAFETY				
A. Requirements				
1. Offsite Hazardous Materials Packaging and Transportation Safety				
a. Does the Field Office have a management system in place to ensure that each package and shipment of hazardous material is prepared in compliance with the Hazardous Materials Regulations of the Department of Transportation?				
b. Does the Field Office have a management system in place to ensure that each package and shipment of hazardous material is prepared in compliance with the applicable state, Tribal and local regulations that are not otherwise preempted by DOT?				

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c. Does the Field Office has a management system in place to ensure that each shipment of hazardous material on DOE vehicles operated by DOE employees or by employees of DOE contractors that are state agencies (not otherwise subject to DOE jurisdiction) follows the Hazardous Materials Regulations and applicable state, Tribal, and local regulations that are not otherwise preempted by DOT?				
d. Has the Field Office obtained exemptions from any or all of the requirements of DOE Order 460.1A from the Office of Environmental Management provided it is not prohibited by law or does not present an undue risk to public health and safety, the environment, or personnel?				
e. If the Field Office does possess exemptions from all or portions of DOE Order 460.1A, can the Field Office produce written documentation outlining the alternative requirements?				
f. For packages or shipments that are not in compliance with DOT regulations, does the Field Office ensure that DOE, or the contractor transportation organization under its control, have a valid DOT exemption or is party to an existing exemption?				
2. Special Requirements for Radioactive Material Packagings				
a. Does the Field Office have a management system in place to ensure that Type A packages that are commercially procured or contractor-provided Type A, Specification 7A packages, have all the required documentation on design, testing, and use?				

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b. For NRC-Certified Type B or Fissile Radioactive Material Packagings, does the Field Office have a management system in place to ensure each package used has a current Certificate of Compliance and that each shipment complies with the requirements of the Certificate?				
c. For NRC-Certified Type B or Fissile Radioactive Material Packagings, does the Field Office have a management system in place to ensure that DOE or the contractor transportation organization is registered with the NRC as a user of the package?				
d. Does the Field Office have a management system in place to ensure that offerors of plutonium in excess of 20 curies per package are using packaging approved by a Headquarters Certifying Official or the NRC?				
e. Does the Field Office have a management system in place to ensure that offerors of Type B quantities of plutonium for air transportation are using packaging approved by a Headquarters Certifying Official or the NRC?				
f. For international shipments, does the Field Office have a management system in place to ensure that offerors are in compliance with applicable regulations of the International Civil Aviation Organization's Technical Instructions (Air Transport) or the International maritime Dangerous Goods Code (Vessel Transport)?				

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3. Onsite Safety Requirements				
a. Does the Field Office have a management system in place to ensure that all onsite shipments of hazardous materials are conducted in compliance with the requirements of the Hazardous Materials Regulations?				
b. For shipments that are not in compliance with DOT requirements, can the Field Office provide an approved Transportation Safety Document that describes the methodology and compliance process used to meet <u>equivalent safety standards</u> for deviating from the Hazardous Materials Regulations?				
4. Motor Carrier Safety Requirements				
a. Does the Field Office have a management system in place to ensure that each contractor who is a DOT-registered carrier and operates a government-owned or commercial motor vehicle offsite is in compliance with the Federal Motor Carrier Safety Regulations?				
b. Does the Field Office have a management system in place to ensure that DOE employees or employees of DOE contractors that are state agencies (not otherwise subject to DOT jurisdiction) comply with the same requirements as a DOT-registered carrier?				
5. Aircraft Safety Requirements				
a. Does the Field Office have a management system in place to ensure that all DOE transportation operations by aircraft follow the requirements of DOE Order 440.2 Aviation?				

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6. Pipeline Safety Requirements				
a. If applicable, does the Field Office have a management system in place to ensure that all hazardous materials transported by pipeline are in compliance with the requirements of 49 CFR parts 190-193, 195, and 199?				
B. Responsibilities				
1. Heads of Operations Offices or Field Offices				
a. Can the Field Office demonstrate a system established to implement the requirements of DOE Order 460.1A?				
b. Has the Field Office demonstrated that it has a system established to ensure that contractors under its purview fully implement and comply with the requirements of DOE Order 460.1A?				
c. Has the Field Office actively pursued incorporation of DOE Order 460.1A and the Contractors Requirements Document into the existing contract through clauses or modification of the Statement of Work?				
d. Can the Field Office demonstrate that it has developed a system to ensure the sharing of packaging and transportation safety issues, lessons learned, and successes?				
e. When applicable, can the Field Office demonstrate that it has a system in place to obtain waivers from state, Tribal, and local transportation laws, rules, and regulations as needed to meet safety requirements?				

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III. DOE Order 460.2, DEPARTMENTAL MATERIALS TRANSPORTATION AND PACKAGING MANAGEMENT				
A. Requirements				
1. Has the Field Office ensured the development of a Transportation Plan to provide specific information regarding the transportation of spent nuclear fuel, high-level waste, and high-visibility shipments and campaigns?				
2. For those shipments identified in question III, A, 1, did the Field Office use the Prospective Shipments Module (PSM) to develop its plan?				
3. Does the Field Office ensure that utilization of the TRANSCOM system to track and monitor spent nuclear fuel, high-level waste, and/or high-visibility shipments and campaigns?				
4. To the maximum extent possible, does the Field Office ensure utilization of the Automated Transportation Management System (ATMS)?				
5. Does the Field Office have a management system in place to ensure that government funds are not used for insurance purposes on shipments made for or on behalf of the U.S. Government?				
6. Does the Field Office have a management system in place to ensure that all commercial bills of lading used in the transportation of materials made by or to Department contractors provide the correct notations of "in care of" or "for the United States Department of Energy?"				

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7. Does the Field Office have a management system in place to ensure that all request for military air transport services are forwarded to EM-1 or its designee with all required and necessary information and documentation?				
8. Does the Field Office have a management system in place to ensure that all shipments are inspected upon receipt for damage, loss, and/or evidence of leakage?				
9. Does the Field Office have a management system in place to ensure that all shipments of radioactive materials are inspected for external surface contamination?				
10. Does the Field Office have a management system in place to ensure that all contaminated delivery conveyances are detained and the delivering carrier is immediately notified?				
11. Does the Field Office have a management system in place to ensure that states and Tribal jurisdictions are notified in advance of all spent fuel or high-level waste shipments by registered, return-receipt-requested mail at least seven days before shipments? <i>Alternatively, Doe may send a notification delivered by messenger at least four day before shipment.</i>				
12. Does the Field Office have a management system in place to ensure that telephone notifications of schedule changes that differ by more than six hours from the previous notification are made? Are records available to substantiate that this procedure is being followed?				
13. Does the Field Office have a management system in place to ensure shipments of fissile material, shipments of more than Type A quantity, and/or shipments that are gas poisonous by inhalation, that consignees are notified of the shipments expected date of arrival and/or any special loading or unloading instructions?				

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14. Does the Field Office have a management system in place to ensure that for the shipments identified in question III, A, 13, proper notifications are received if shipments have not been received on the estimated date(s) of arrival?				
15. Does the Field Office have a management system in place to ensure that all shipment data are reported to the Enterprise Transportation Analysis System (ETAS) on a consistent basis? If excepted from ETAS reporting requirements (written approval), does the Field Office provide the annual shipment data report required?				
16. Does the Field Office have a management system in place to ensure the use of the "Motor Carrier Evaluation Program" to evaluate all carriers utilized to transport Highway Route Controlled Quantities (HRCQ) of radioactive materials in less-than-truckload (LTL) or truckload (TL) quantities and hazardous waste in any quantity?				
17. Is a copy of each evaluation provided to NTP-A within 45 days of completion?				
18. Does the Field Office ensure the use of carriers who's rates are on file with EM-1, NTP-A, or other Field Offices?				
19. For carriers who's rates are not on file with NTP-A or other Field Offices, does the Field Office ensure written justification or provide approval for the use of that carrier?				
20. As applicable, has the Field Office received classification approvals from the Albuquerque or Oakland Operations Offices for the transport of new explosive substances, articles, or devices?				
21. Pursuant to question III, A, 20, does the Field Office possess a copy of the proper DOT registration of the new explosive substances, articles, or devices?				

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22. Has the Field Office performed compliance assessments of its contractor transportation and packaging operations within the past three years utilizing the Transportation Compliance Evaluation/Assistance Program (TCEAP)?				
23. Does the Field Office have a management system in place to identify reusable radioactive materials packagings in inventory, programmatically excess packagings, newly decertified packaging, new packaging needs, and packagings under development and to report them to NTP-A annually?				
B. Responsibilities				
1. Does the Field Office have a management system in place to ensure contractor compliance with the requirements of DOE Order 460.2?				
2. As applicable, has the Field Office issued Price-Anderson indemnity agreement certification to carrier upon their request or notified the requesting carriers and the referring organization that the shipment is not covered by an indemnity agreement?				
3. Does the Field Office negotiate or authorize its contractors to negotiate with carriers concerning rates, classification ratings, services, and related transportation matters for specific sites for which they are responsible?				
4. Does the Field Office have a management system in place to identify and notify NTP-A, other Field Offices, and cognizant Program Officers of significant rate changes and new or changing state, Tribal, or local laws, rules, or regulations?				
5. Does the Field Office issue government bills of lading or authorize its contractors to issue government bills of lading within prescribed limitations?				

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6. Has the Field Office actively pursued incorporation of DOE Order 460.2 and the Contractors Requirements Document into the existing contract through clauses or modifications to the Statement of Work?				
IV. Specific Requirements in Doe Order 460.2 for Albuquerque and Oakland Operations Offices				
1. Does the Operations Office have a list of all reviews performed and all approval requests granted or denied for classification of new explosives?				
2. Does the Operations Office have a system to ensure that all pertinent and appropriate documentation is forwarded to NTP-A for the DOT exemption approval process?				
V. Specific Requirements per DOE Policy Memorandum for Low-level Waste Packaging and Transportation Practices				
1. How has the Field Office identified occurrences similar to those outlined in the Type B Investigation Report of the Kingman, Arizona incident?				
2. How has the Field Office implemented corrective actions for those similar occurrences identified in question V, 1?				
3. Has the Field Office developed a quality system that identifies the requirements of its offsite waste transportation program, including internal audits, identification of nonconformance issues, corrective actions, and verification of corrective action implementation?				
4. How does the Field Office confirm the effectiveness of the absorbents (if applicable) used in the final waste stream to ensure nongeneration of free liquids in the waste stream?				
5. What is the quality assurance process to ensure that all pertinent documents are part of the Request for Proposal and contract award process?				

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6. What is the quality assurance process for evaluating container design and performance criteria to meet all the expected requirements related to handling, storage, stacking, loading, transportation, and unloading of the containers?				
7. What is the quality assurance process for ensuring that containers have been manufactured to engineering and design specifications prior to acceptance of the containers at the site?				
8. What is the quality assurance process for the inspection of containers currently onsite to ensure they meet all engineering and design specifications prior to loading?				